

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**IN RE THE COMPLAINT AND PETITION
OF ORION MARINE CONSTRUCTION,
INC., AS OWNER OF THE "JOHN C.
LAQUAY," ITS ENGINES, TACKLE,
APPAREL, ETC., IN A CAUSE FOR
EXONERATION FROM OR LIMITATION
OF LIABILITY**

C.A. NO. 4:17-cv-02099

**In Admiralty Pursuant to
Rule 9(h)**

**CERTIFICATE OF INTERESTED PARTIES
OF PETITIONER ORION MARINE CONSTRUCTION, INC.**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Petitioner Orion Marine Construction, Inc. submits this Certificate of Interested Parties.

Petitioner advises this Court of the following individuals and entities related to Petitioner that likely have a financial interest in the outcome of this litigation:

1. Petitioner Orion Marine Construction, Inc.
P.O. Box 108
159 Highway 316
Port Lavaca, Texas 77979

Petitioner Orion Marine Construction, Inc. is the owner of the Dredge *John C. LaQuay*, etc., and requests it be exonerated from liability or, alternatively, have its liability limited, all in accordance with the Limitation of Liability Act, 46 U.S.C. §30501-30512. Orion Marine Construction, Inc. is a Florida Corporation authorized to do business in Texas. Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Petitioner advises it is a wholly-owned subsidiary of Orion Marine Group, Inc., an entity traded publically on the New York Stock Exchange.

2. Orion Marine Group, Inc.
12000 Aerospace Ave., Ste. 300
Houston, Texas 77034

Orion Marine Group, Inc. is a publically traded company listed on the New York Stock Exchange, and is the parent company of Petitioner Orion Marine Construction, Inc. Orion Marine Group, Inc. did not employ any of the crewmembers of the Dredge *John C. LaQuay*, etc. at any time relevant to the voyage at issue, nor did Orion Marine Group, Inc. own, operate or control the Dredge *John C. LaQuay*, etc. at any time relevant to the

voyage at issue. Orion Marine Group, Inc. is identified solely pursuant to Rule 7.1 of the Federal Rules of Civil Procedure.

3. The Dredge *John C. LaQuay*, its engines, tackle, apparel, etc.

4. MUNSCH, HARDT, KOPF & HARR, P.C.

Messrs. Daniel D. Pipitone and Kenneth W. Bullock, II

Pennzoil Place

700 Milam, Suite 2700

Houston, Texas 77002

(713) 222-1470 – Telephone

(713) 222-1475 – Facsimile

Counsel for Petitioner and for the vessel at issue.

Petitioner further advises this Court of the following individuals and entities related to Potential Claimants that likely have a financial interest in the outcome of this litigation:

1. Mr. Eladio Reyes Mendoza

Mr. Mendoza is a potential claimant in this case, and may be contacted through his counsel of record.

2. The Buzbee Law Firm

Mr. Anthony G. Buzbee

600 Travis Street, Suite 7300

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Mr. Buzbee is counsel for Mr. Mendoza.

Respectfully submitted,

MUNSCH, HARDT, KOPF & HARR, P.C.

By: *s/ Kenneth W. Bullock, II*

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